

## EXHIBIT C

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June 28, 2022

**VIA E-MAIL and  
CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

TO: Curte Ferguson, Jr.  
Fidelity and Deposit Company of Maryland, Federal Insurance Company,  
and Zurich American Insurance Company  
P.O Box 968038  
Schaumburg, Illinois 60196  
E-mail: curte.ferguson@zurichna.com

RE: Claimant: Alstom Signaling Inc.  
Project: NJT PTC Installation  
Contract No. 10-099X  
Principal: Parsons Transportation Group, Inc.  
Obligee: New Jersey Transit Corporation  
Bond Nos.: 09051680, 82060817, 09121517, and 81619239

Dear Mr. Ferguson:

I write to provide the additional information requested in your March 15, 2022 correspondence, which acknowledged receipt of Alstom's claim<sup>1</sup> in connection with the above-referenced bonds.

As requested, please find the attached supplemental information in support of Alstom's claim as well as a completed "Proof of Claim Form". A summary of the supplemental information which Alstom is providing is listed below:

- i. Proof of Claim Form (attached);<sup>2</sup>
- ii. Alstom Signaling Inc.'s Subcontract with Parsons Transportation Group Inc., which encloses Parsons' Prime Contract with New Jersey Transit;

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<sup>1</sup> Dated February 16, 2022.

<sup>2</sup> With respect to item #5 in the Proof of Claim Form, and as described in my February 16, 2022 letter, Parsons has notified Alstom of purported back charges which have been disputed by Alstom. Parsons has not provided any documentation regarding its alleged back charges and has refused Alstom's requests for additional information.

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- iii. All Supplemental Agreements and Change Orders executed between Alstom and Parsons;
- iv. Alstom's initial cost proposals and most recent request for equitable adjustment for Additional Measures work. (ALS-PTG-L0656; ALS-PTG-L0642; ALS-PTG-L0695R2);
- v. Parsons' letter to New Jersey Transit regarding the start of Additional Measures work. (PTG-NJT-01704R);
- vi. Parsons' letter to Alstom stating that it settled Alstom's Additional Measures claim with New Jersey Transit. (PTG-ALS-01877);
- vii. Correspondence showing the total amount paid for Alstom's Additional Measures claim (including ALS-PTG-L1125, PTG-ALS-01906, ALS-PTG-L1136R, and emails dated 11/13/2020 and between Alstom and Parsons);
- viii. Alstom's request for equitable adjustment for 50 Lost Cars. (ALS-PTG-L0783R);
- ix. Alstom letters notifying Parsons of impacts that resulted in extended Project durations and additional work. (ALS-PTG-L0576; ALS-PTG-L0589; ALS-PTG-L0688);
- x. Alstom's request for equitable adjustment, dated August 5, 2019, for extended Project durations. (ALS-PTG-L0841);
- xi. Parsons' letter conveying that New Jersey Transit indicated there was entitlement for both the Additional Measures and extended Project durations requests for equitable adjustment. (PTG-ALS-L01673);
- xii. Alstom letter rejecting Parsons' proposed settlement with New Jersey Transit on Alstom's behalf. (ALS-PTG-L1069);
- xiii. Parsons' letters PTG-ALS-L01909, PTG-ALS-L01910, PTG-ALS-L02020;
- xiv. Alstom letters ALS-PTG-L1159 and ALS-PTG-L1220;
- xv. Parsons' letter unilaterally extending the Project through December 31, 2021. (PTG-ALS-02266);
- xvi. Alstom's response to Parsons' unilateral extension and request for equitable adjustment. (ALS-PTG-L1351, ALS-PTG-L1363);
- xvii. Parsons' rejection of Alstom's request for equitable adjustment. (PTG-ALS-02333);
- xviii. Alstom request for equitable adjustment for work in 2022 (ALS-PTG-L1430); and

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xix. Alstom letter notifying Parsons of overdue payments (ALS-PTG-L1422).

Lastly, as part of Alstom's February 16, 2022 notice of claim, I requested complete copies of the payment and performance bonds for the Project. Please forward copies to my attention at the above law office at your earliest convenience.

Alstom reserves all rights under the Performance and Payment Bonds, its Subcontract with Parsons, or otherwise available at law.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph T. Imperiale".

Joseph T. Imperiale  
*Attorney for Alstom Signaling Inc.*

Enc.

Cc: Parsons Transportation Group, Inc.  
c/o Nicholas C. LaRocco  
Parsons' Designated Representative  
Vice President, Parsons Transportation Group, Inc.  
100 Broadway  
New York, New York 10005

**Attachment 1:**  
**Proof of Claim Form**

Claim No: 6380085962

## Zurich

*(Including but not limited to Fidelity & Deposit Company of Maryland, Zurich American Insurance Company, Colonial American Casualty and Surety Company, American Guarantee and Liability Insurance Company, Steadfast Insurance Company and Universal Underwriters Insurance Group hereinafter "Company")*

### Proof of Claim

STATE OF New York COUNTY OF Monroe ss:  
Nadia Zaari, being duly sworn, deposes and says:

1. (a) IF AN INDIVIDUAL, OR SOLE PROPRIETOR

That he is the Claimant herein, and operates a business under the firm name and style of \_\_\_\_\_  
\_\_\_\_\_ at \_\_\_\_\_  
City of \_\_\_\_\_ County of \_\_\_\_\_ State of \_\_\_\_\_

(b) IF A CO-PARTNERSHIP

That he is a member of \_\_\_\_\_ a co-partnership, herein-  
after designated as Claimant, composed of deponent and \_\_\_\_\_  
which firm has its principal place of business at \_\_\_\_\_  
City of \_\_\_\_\_ County of \_\_\_\_\_ State of \_\_\_\_\_

(c) IF A CORPORATION

That she is Vice President of Alstom Signaling Inc. Claimant herein, which is a corporation organized and existing under the laws of the State of Delaware and having a place of business at 4545 East River Road, City of West Henrietta County of Monroe State of New York and is duly authorized to make this Proof of Claim on its behalf.

2. That Parsons Transportation Group, Inc., hereinafter called Contractor, was at and before the filing of this Proof of Claim, and still is, justly and truly indebted to Claimant, in the sum of \$ 46,223,232.41 for labor, materials, supplies and/or services heretofore furnished to said Contractor for use in the performance of Contractor's contract with New Jersey Transit Corporation (Name of Owner) NJT PTC Installation Contract No. 10-099X. Attached is itemized statement of claim together with supporting evidence, consisting of copy of subcontract invoices, change orders, requests for equitable adjustment, and relevant correspondence.

3. That the date on which Claimant last furnished any labor, material or supplies and services in connection with said claim was the date of this document, as Alstom's work on the Project is still ongoing.

4. That Claimant has satisfied in full all claims for labor, materials, supplies and/or other things of value, purchased, furnished fabricated or supplied by it for use in connection with the aforesaid contract, except those noted on the back of this form, and no such payments have been made by notes which are unpaid at this time.

5. That there are no setoffs, counterclaims, back charges, or other credits due said Contractor against said claim, and that Claimant is not indebted to said Contractor on this, or on any other account, and that Claimant does not hold any note or security for any kind whatsoever for said debt.

6. That this affidavit is made in support of the above described claim against, and for the purpose of inducing, Zurich, as surety for said Contractor, to pay said claim under the bond which it executed as surety for said Contractor.

7. That as a further inducement to Zurich for making payment at this time, Claimant hereby agrees that all guarantees and warranties required under the terms of the aforesaid contract pertaining to the work, labor and materials furnished by the undersigned shall remain in full force and effect in accordance with their terms which, however, shall not be extended nor enlarged hereby.

Subscribed and sworn to before me this

27th day of  
June 20 22

M E D NOTARY PUBLIC

Nadia Zaari  
Signature of Claimant

Nadia Zaari  
Printed Name and Title

MEGAN ELIZABETH DAVIS  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01DA6198692  
Qualified in Livingston County  
My Commission Expires 12-29-2024

Unsatisfied claims for the aforesaid contract include:

- All claims identified in my letter of February 16, 2022;
- All unpaid change orders and requests for equitable adjustment; and
- All claims that may arise as a result of Alstom's continuing work on the Project.

Alstom's Itemized Statement of Claim:<sup>3</sup>

<b>Claim</b>	<b>Value</b>
Request for Equitable Adjustment for Extension of Time (2019-2020)	\$ 23,549,209.86
Request for Equitable Adjustment for Extension of Time (2021)	\$ 9,358,766.77
Request for Equitable Adjustment for Extension of Time (2022)	\$ 1,523,418.25
Request for Equitable Adjustment for Additional Measures for 2018 Vehicle Production Requested by NJ State Commissioner and NJ Transit	\$ 4,543,596.35
Request for Equitable Adjustment for Delays Outside Alstom Control – 50 Lost Cars	\$ 2,645,657.92
Undisputed and Unpaid Invoices <sup>4</sup>	\$ 4,602,583.26
<b>TOTAL</b>	<b>\$ 46,223,232.41</b>

<sup>3</sup> This submission reflects Alstom's updated REA damages calculations based on its best current information on this on-going Project. The above damage numbers include anticipated additional warranty costs associated with the additional work and extended Project durations, for which Alstom is not responsible.

<sup>4</sup> This figure is accurate as of May 31, 2022. Alstom is in the process of supplementing letter ALS-PTG-L1442 to account for recent changes.